

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**STATE DEFENDANTS' RESPONSES AND OBJECTIONS TO
CURLING PLAINTIFF'S THIRD SET OF INTERROGATORIES**

State Defendants, Brad Raffensperger, in his official capacity as Secretary of State of Georgia, Rebecca N. Sullivan, Sara Tindall Ghazal, Matthew Mashburn, Anh Le, and the Georgia State Election Board (“State Defendants”) hereby respond through counsel of record to Curling Plaintiffs’ Third Set of Interrogatories to State Defendants as follows:

PRELIMINARY STATEMENT

State Defendants incorporate the following preliminary statement within all responses which follow.

1. State Defendants object to the interrogatories that seek information or documents reflecting communications protected by the attorney-client privilege and material protected by the work product doctrine.

2. State Defendants object to the interrogatories that are overly broad and seek information neither relevant to this civil action nor reasonably likely to lead to discovery of admissible evidence.

3. State Defendants object to the interrogatories that are unduly burdensome, unreasonably cumulative, or duplicative, or call for cumulative documents or information.

4. State Defendants object to the interrogatories that are intended solely for the purposes of annoyance, embarrassment, harassment, or oppression.

5. State Defendants object to the interrogatories as discovery has not yet closed and State Defendants are currently producing nearly all documents in the possession of the State Defendants, from which Curling Plaintiffs can obtain the information sought herein.

6. State Defendants incorporate their continued objection to the scope of discovery in this case as beyond that permitted by the scope of Rule 26 and inconsistent with the abbreviated discovery ordered by the Court.

7. State Defendants further object inasmuch as these requests reflect information Plaintiffs alleged they possessed in their complaints and responsive to State Defendants' outstanding discovery requests.

8. State Defendants reserve the right to supplement these responses as discovery proceeds.

9. State Defendants object to the instructions and definitions that vary from, purport to modify or enlarge, or are inconsistent with the Federal Rules of Civil Procedure.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 27:

Identify and describe with specificity all measures taken to investigate, evaluate, remedy, mitigate, or otherwise address each of the Security Vulnerabilities and problems with the Current Election System identified in Dr. J. Alex Halderman's declarations, reports, and testimony in this matter.

RESPONSE TO INTERROGATORY NO. 27:

State Defendants object to this Interrogatory as it seeks confidential information, trade secrets, sensitive election security information, and/or state secrets. State Defendants also object to the Interrogatory to the extent it seeks documents subject to the attorney-client privilege and/or the work-product doctrine.

State Defendants further object to the interrogatory as vague, ambiguous, overly broad and unduly burdensome, as the request requires State Defendants to identify and describe “all measures.”

Subject to and without waiving the foregoing objections, State Defendants respond that because Dr. Halderman’s expert report in this case is designated “attorneys eyes only,” State Defendants are not authorized to review Dr. Halderman’s expert report. Accordingly, State Defendants do not have knowledge of the “Security Vulnerabilities and problems with the Current Election System identified in [Dr. Halderman’s report].” State Defendants further direct Curling Plaintiffs to State Defendants’ responses to Curling Plaintiffs’ interrogatories 16, 17, 22, and 23. State Defendants reserve the right to supplement this response as discovery develops and they continue to prepare for trial.

This 1st day of October, 2021.

/s/ Vincent Russo

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Counsel for State Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this day, I served a true and correct copy of the foregoing **STATE DEFENDANTS' RESPONSES AND OBJECTIONS TO CURLING PLAINTIFF'S THIRD SET OF INTERROGATORIES** was served on all counsel of record by electronic delivery of a PDF version.

This 1st day of October, 2021.

/s/ Vincent Russo

Vincent R. Russo

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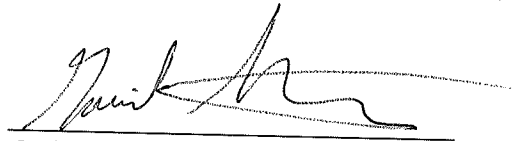
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VERIFICATION FOR INTERROGATORY RESPONSE

Pursuant to 28 U.S.C. § 1746, the below signatory declares under penalty of perjury that the statements contained within **STATE DEFENDANTS' RESPONSES AND OBJECTIONS TO CURLING PLAINTIFFS' THIRD SET OF INTERROGATORIES** dated October 1, 2021 were prepared with the assistance and advice of counsel and the assistance of employees of the Secretary of State's office, upon which he has relied; and are true and correct to the best of his knowledge, information, and belief.



Gabriel Sterling
Office of the Georgia Secretary of State